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May 7, 2020

**VIA ECF**

The Honorable John G. Koeltl  
U.S. District Judge  
U.S. District Court for the  
Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

Application granted.  
SO ORDERED.

New York, NY	<u>/s/ John G. Koeltl</u>
May 8, 2020	John G. Koeltl
	U.S.D.J.

**Re: *Traxys North America, LLC v. Metal Partners Rebar, LLC***  
**Case No. (1:20-cv-02766-JGK)**  
**Request for Extension of Time to Submit Rule 26(f) Report**

Dear Judge Koeltl:

This firm was retained today to represent Defendant Jose Carrero in the above referenced matter. We will soon be filing a substitution of counsel in place of Fox Rothschild, LLP, Peter Roberts, Esq., John Wait, Esq., and Alexandra L. Sobol, Esq., who earlier appeared on behalf of Mr. Carrero.

On behalf of Mr. Carrero, we respectfully request a 14-day extension of time for the parties to prepare and submit their Rule 26(f) report, which we understand is currently due on Friday, May 8, 2020. No previous request to extend the time to file the Rule 26(f) report has been made. Plaintiff and Defendants JP Morgan Chase Bank, N.A. and Intermetal Rebar, LLC have consented to the extension. Defendants Metal Partners Rebar, LLC and BGD LV Holding, LLC have not raised any objection to an extension—our understanding is that they also have consented to it.

Mr. Carrero has not yet filed a response or answer to the First Amended Complaint. Although Mr. Carrero has also recently retained the law firm of Zarco, Einhorn, Salkowski & Brito, P.A. to co-represent him in this matter, the Zarco Law Firm and its attorneys will first need to seek *pro hac vice* admission to this Court.

We are requesting an extension of time to prepare and file the Rule 26(f) report because we require additional time to adequately acquaint ourselves with the facts of this case, and any possible defenses or affirmative claims that Mr. Carrero could possibly raise in response to the First Amended Complaint. We believe in good faith that it would be premature to prepare and file the Rule 26(f) report without first undertaking that investigation.

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If your Honor consents to our request for extension made in this letter, the parties' Rule 26(f) report would be due May 22, 2020.

Thank you for your time and attention to this matter.

Respectfully submitted,

/s/ Andrew N. Krinsky

Andrew N. Krinsky

cc: All counsel of Record via ECF